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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15
16 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

17 THIS DOCUMENT RELATES TO:
18 ALL ACTIONS
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Master Docket No. 11-CV-2509-LHK

**[PROPOSED] ORDER GRANTING
DEFENDANTS' JOINT RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL REGARDING
FILINGS RELATED TO PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
JOINT MOTIONS *IN LIMINE***

1 Having considered Defendants' Joint Response to Plaintiffs' Administrative Motion to
2 Seal Regarding Filings Related to Plaintiffs' Opposition to Defendants' Joint Motions *In Limine*
3 [ECF No. 889] and the declarations submitted in support of that motion, having determined that
4 the public disclosure of the confidential information described therein would harm Defendants,
5 and finding good cause to seal that information, IT IS HEREBY ORDERED THAT the motion
6 is GRANTED.

7 Pursuant to Northern District Civil Local Rule 79-5, the following portions of the
8 following documents have been properly redacted and publicly filed, for the reasons provided in
9 the corresponding declarations. The redacted portions shall remain under seal.

Brief or Exhibit To Be Sealed	Source of Support for Sealing
Plaintiffs' Opposition to Defendants' Joint Motions <i>In Limine</i> (redacted portions) (Proposed redacted version filed at ECF No. 889-3)	Declaration of Anne M. Selin ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 894) ("Selin Decl.") at ¶ 4.
Ex. 1 to the Declaration of Anne B. Shaver ISO Plaintiffs' Opposition to Defendants' Joint Motions <i>In Limine</i> (ECF No. 881) ("Shaver Ex.") (redacted portions) (Proposed redacted version filed at ECF No. 889-1)	Selin Decl. at ¶ 5; Declaration of Christina Brown ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 893) ("Brown Decl.") at ¶ 3.
Shaver Ex. 13 (redacted portions) (Proposed redacted version filed at ECF No. 846)	Selin Decl. at ¶ 6; Brown Decl. ¶ 4; Declaration of Gregory M. Sergi on Behalf of Intel ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 892) ("Sergi Decl.") at ¶ 5.
Shaver Ex. 14 (redacted portions) (Proposed redacted version filed at ECF No. 842)	Selin Decl. at ¶ 7; Sergi Decl. ¶ 6; Declaration of Lin W. Kahn ISO Defs.' Joint Response to Administrative Motion to Seal (ECF No. 890) ("Kahn Decl.") at ¶ 9.

Brief or Exhibit To Be Sealed	Source of Support for Sealing
Shaver Ex. 15 (redacted portions) (Proposed redacted version filed at ECF No. 842-2)	Selin Decl. at ¶ 8.
Shaver Ex. 17 (redacted portions) (Proposed redacted version filed at ECF No. 832-2)	Selin Decl. at ¶ 9; Kahn Decl. at ¶ 10; Brown Decl. ¶ 5; Declaration of Roberta D. Tonelli ISO Defs.’ Joint Response to Plaintiffs’ Administrative Motion to File Under Seal (ECF No. 891) (“Tonelli Decl.”) at ¶ 8.
Shaver Ex. 18 (redacted portions) (Proposed redacted version filed at ECF No. 856-8)	Selin Decl. at ¶ 10; Sergi Decl. ¶ 7; Brown Decl. ¶ 6.
Shaver Ex. 19 (redacted portions) (Proposed redacted version filed at ECF No. 856-10)	Selin Decl. at ¶ 11; Kahn Decl. at ¶ 11; Sergi Decl. ¶ 8; Tonelli Decl. at ¶ 9; Brown Decl. ¶ 7.
Shaver Ex. 80 (redacted portions) (Proposed redacted version filed at ECF No. 889-11)	Sergi Decl. ¶ 9.
Shaver Ex. 278 (redacted portions) (Proposed redacted version filed at ECF No. 889-5)	Brown Decl. ¶ 8.
Shaver Ex. 279 (redacted portions) (Proposed redacted version filed at ECF No. 889-7)	Brown Decl. ¶ 9.
Shaver Ex. 281A (redacted portions) (Proposed redacted version filed at ECF No. 889-9)	Brown Decl. ¶ 10.

IT IS SO ORDERED.

Date: _____

HONORABLE LUCY H. KOH
United States District Court Judge